

MEMO ENDORSED

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

FEB - 5 2008

Zurab Kakushadze,  
A46-132-266

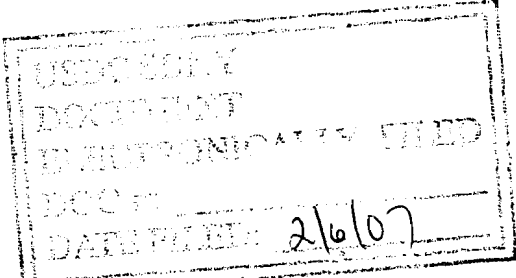
Plaintiff,

-against-

MICHAEL CHERTOFF, SECRETARY OF THE  
DEPARTMENT OF HOMELAND SECURITY  
and  
ROBERT MUELLER, DIRECTOR,  
FEDERAL BUREAU OF INVESTIGATION  
Defendants.

07 Civ. 8338 (DCF)

ECF Case



REQUEST FOR AN EXTENSION OF TIME TO FILE OPPOSITION  
TO DEFENDANT'S MOTION TO DISMISS

Comes now the Plaintiff, ("Plaintiff or "Mr. Zurab Kakushadze"), by and through  
his attorneys, the Law Office of Jan H. Brown, PC and pleads as follows:

We hereby request an additional two weeks in which to submit a Memorandum in  
response to the Defendant's Motion to Dismiss, originally due February 6, 2008.

We have contacted the attorney for the Defendants, and have not heard back from  
him at this time. We ask for more time in order to conduct additional research in order to  
fortify our arguments. We believe that this additional time is necessary in order to  
answer the Defendants' strong and lengthy opposition to this Writ of Mandamus, and that  
doing so is in the best interests of our clients and of justice.

Dated: New York, New York  
February 5, 2008

Respectfully submitted,  
*Jan H. Brown*  
SO ORDERED: DATE: 2/6/08  
*Debra Freeman*  
DEBRA FREEMAN  
UNITED STATES MAGISTRATE JUDGE

*The dates set forth in the court's  
scheduling order of 1/8/08 are  
extended as follows:  
Plaintiff's opposition to the motion  
to dismiss shall be served and filed  
no later than 2/20/08, and defendant's  
reply, if any, shall be served and filed  
no later than 3/5/08. The deadline  
for fact discovery remains at 4/30/08.*

Law Office of Jan H. Brown, PC  
Jan H. Brown, Esq.  
1150 Ave. of the Americas, Ste. 700  
New York, NY 10036

Counsel for Plaintiff